

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC  
PARTICIPATION et al.,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its  
attorney general, LETITIA JAMES, ATTORNEY  
GENERAL OF THE STATE OF NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL et al.,

Defendants.

Civil Action No. 20-cv-8668

**DECLARATION OF MARY WINTER IN SUPPORT OF PRIVATE PLAINTIFFS'  
MOTION TO PERMIT REMOTE TESTIMONY BY PLAINTIFF MARY WINTER**

Mary Winter hereby declares pursuant to 28 U.S.C. § 1746 and under penalty of perjury:

1. I am one of the Plaintiffs in this case. I have personal knowledge of the facts stated here.
2. In January 2024, I moved to Donnersbergkreis, Germany with my husband, who is stationed there as part of his service in the U.S. Army.
3. I am the primary caretaker for our one-year-old child. I am also due to give birth to another child in September 2024.
4. Traveling to New York to testify in person in April would pose substantial financial and logistical barriers. Beyond the need to travel internationally while pregnant, I

would also need to arrange for appropriate childcare for several days, either in Germany or in New York.

Dated: March 1, 2024

Village of Winnweiler, Donnersbergkreis,  
Germany

  
Mary Winter